

# ***Exhibit I***

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION  
TRACY CAEKAERT and CAMILLIA MAPLEY,  
PLAINTIFFS,  
-against- Case No.:  
CV-20-52-BLG-SPW  
WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW  
YORK, INC., and WATCH TOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA,  
DEFENDANTS.  
-----X  
ARIANE ROWLAND and JAMIE SCHULZE,  
PLAINTIFFS,  
-against- Case No:  
CV-20-59-BLG-SPW  
WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW  
YORK, INC., and WATCH TOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA,  
DEFENDANTS.  
-----X  
DATE: December 6, 2023  
TIME: 9:09 A.M.  
VIDEO-RECORDED EXAMINATION  
BEFORE TRIAL of the Non-Party Witness,  
ALLEN SHUSTER, taken by the Plaintiffs,  
pursuant to a Subpoena, held at the offices

1 A. SHUSTER

2 A. I do, yes.

3 Q. Those are your affidavits from  
4 the same two cases listed in the subpoena  
5 that we discussed as Exhibit 1 this  
6 morning; correct?

7 A. Correct.

8 Q. You signed both of those  
9 documents; correct?

10 A. Correct.

11 Q. Did you draft those documents?

12 A. I helped draft, yes.

13 Q. Who else helped?

14 A. I don't know specifically.

15 Q. Paragraph two of each document  
16 says that you have personal and direct  
17 knowledge of the matters set forth;  
18 correct?

19 A. Correct.

20 Q. Someone else drafted  
21 information for you in these affidavits  
22 that's part of your personal knowledge, and  
23 you don't know who that person is. Is that  
24 correct?

25 MS. KORGUL: Objection to the

1 A. SHUSTER

2 form. That's not what he said.

3 A. I provided information in  
4 regard to this affidavit. I don't remember  
5 who specifically helped in the preparation  
6 of it.

7 Q. Who did you provide the  
8 information to?

9 A. The legal department.

10 Q. I don't want to hear any advice  
11 that the legal department gives you, but my  
12 question is, do you communicate with the  
13 legal department on a regular basis?

14 A. No.

15 Q. How often do you communicate  
16 with the legal department?

17 A. I would say as a -- as an  
18 on-need basis, periodically. I think that  
19 would be the word I would use,  
20 periodically.

21 Q. Can you help me understand what  
22 periodically means in terms of every month,  
23 every year, every ten years?

24 A. It depends on the situation at  
25 hand. Sometimes we'll -- the service

1 A. SHUSTER

2 Q. Did you provide an application  
3 to become an elder?

4 A. No.

5 Q. How did you become an elder?  
6 Can you please describe the process?

7 You -- you presumably didn't  
8 decide yourself that you were an elder. Is  
9 that correct?

10 A. That is --

11 MS. KORGUL: Objection --

12 A. -- correct.

13 MS. KORGUL: -- to the --  
14 objection to the form. You can  
15 answer.

16 A. Read -- repeat the question,  
17 please.

18 Q. You didn't decide that you  
19 yourself were an elder; correct?

20 A. That's correct.

21 Q. Now, can you tell me how you  
22 came to be an elder?

23 A. I don't know the process. I  
24 really don't.

25 Q. You don't know the process

1 A. SHUSTER

2 A. It's one of a number of elders,  
3 could be a variety of numbers of elders,  
4 and conduct meetings; coordinate --  
5 coordinate the work of the elders within a  
6 congregation.

7 Q. Is that description of duties  
8 correct for the time period of the 1970s to  
9 the 1990s?

10 A. That depends on the time period  
11 we're talking about.

12 Q. Did the duties of a -- or the  
13 responsibilities of a presiding overseer  
14 change between the 1970s and 1990s?

15 A. I'm hesitating because at some  
16 point prior to around 1972 or 4, there was  
17 not a presiding overseer. There was a --  
18 it began -- it began to operate in 1974, I  
19 think, presiding overseer.

20 Q. You're currently the assistant  
21 overseer of the service department. Is  
22 that correct?

23 A. That's correct.

24 Q. Do you recall approximately  
25 when that position began?

1 A. SHUSTER

2 A. I don't recall, no.

3 Q. Did you file an application or  
4 provide an application for that position?

5 A. No.

6 Q. Were you appointed to that  
7 position?

8 MS. KORGUL: Objection to the  
9 form.

10 A. So when you say appointed, what  
11 do you mean by appointed?

12 Q. How did you come to be a  
13 service department assistant overseer?

14 A. I was -- I'm not sure.

15 Q. Is everyone in the service  
16 department the service department assistant  
17 overseer?

18 A. No.

19 Q. How many service department  
20 assistant overseers are there?

21 A. Currently, three.

22 Q. Who are the other two besides  
23 you?

24 A. Anthony Griffin and Scott  
25 Pifer.

1 A. SHUSTER

2 Q. Is there a committee or group  
3 within the religious organization of  
4 Jehovah's Witnesses that makes the decision  
5 of who are the service department assistant  
6 overseers?

7 A. The Branch Committee.

8 Q. You've mentioned the Branch  
9 Committee and the Governing Body. Are  
10 those the same?

11 A. No, they're not.

12 Q. Do they share any members?

13 A. They do not.

14 Q. What is the relationship  
15 between the Branch Committee and the  
16 Governing Body?

17 A. I don't think I can define it.  
18 I don't know.

19 Q. Are there any documents that  
20 describe who the service department  
21 assistant overseers are?

22 A. Not to my knowledge.

23 Q. When you became service  
24 department assistant overseer, were you  
25 told by someone?



1 A. SHUSTER

2 A. That's going back a way. I  
3 don't remember how it -- how it came about.

4 Q. What are your duties or  
5 responsibilities as the service department  
6 assistant overseer?

7 MS. KORGUL: I'll object to the  
8 form of the question.

9 A. I think in the affidavit I  
10 mentioned -- may I refer to it?

11 Q. Yes, please.

12 A. Well, I work with Kingdom Halls  
13 in the United States -- that would be one  
14 responsibility that I have -- and also work  
15 with conventions and assemblies.

16 Q. I've seen a statement from you  
17 in 2011 that said, "My duties in the  
18 service department also include monitoring  
19 the organization functioning and staffing  
20 of congregations of Jehovah's Witnesses."

21 Is that an accurate statement  
22 as of 2011?

23 MS. KORGUL: Objection to the  
24 form.

25 A. Yeah. I just don't remember

1 A. SHUSTER

2 the context of what I said back then. I  
3 just don't remember.

4 Q. Do your duties currently  
5 involve monitoring the organization  
6 functioning and staffing of congregations  
7 of Jehovah's Witnesses?

8 A. Monitoring, I think that's the  
9 word I would take exception to. I'm not  
10 sure what I mean by -- what I meant by  
11 monitoring. I don't monitor anything.

12 Help to coordinate, help to  
13 provide spiritual assistance, yes. I think  
14 that would be my answer.

15 Q. Is it your testimony today that  
16 you've never previously monitored the  
17 organization functioning or staffing of  
18 congregations of Jehovah's Witnesses?

19 MS. KORGUL: Objection to the  
20 form.

21 A. Can you repeat the question,  
22 please?

23 MR. MERRILL: Would you please  
24 read the question back?

25 A. Make sure I have it correct.

1 A. SHUSTER

2 (Whereupon, the referred to  
3 question was read back by the  
4 Reporter.)

5 A. Yeah. I'm not sure why I said  
6 that. That doesn't sound accurate.

7 Q. Have your duties in the service  
8 department ever included reviewing the  
9 qualifications for the appointment of  
10 elders and ministerial servants to  
11 congregations of Jehovah's Witnesses in the  
12 United States?

13 A. No. That's -- that's done on a  
14 local level, on a congregation level. The  
15 elders within the congregation, that's  
16 their function.

17 Q. Is it your testimony there's no  
18 review of the qualifications for the  
19 appointment of elders and ministerial  
20 servants to congregations of Jehovah's  
21 Witnesses in the United States within the  
22 service department?

23 A. Again, that's done by the local  
24 congregation elders.

25 MR. TAYLOR: Objection to the

1 A. SHUSTER

2 form. Timeframe. Timeframe. That's  
3 it.

4 Q. Has the service department --  
5 or excuse me. Strike that.

6 Between the 1970s and 1990s,  
7 did the service department review the  
8 qualifications for the appointment of  
9 elders and ministerial servants to  
10 congregations of Jehovah's Witnesses in the  
11 United States?

12 A. Well, again, that was -- that  
13 was back in the 1970s. That, again, was  
14 handled by the local elders. They --  
15 they're the ones that made the -- made the  
16 conclusion that an individual met the  
17 scriptural qualifications as set forth in  
18 the Bible.

19 Q. So in the 19 -- you said the  
20 1970s in your previous answer. Is that  
21 correct?

22 A. Correct.

23 Q. Did that change in the 1980s?

24 A. No.

25 Q. Did that change in the 1990s?

1 A. SHUSTER

2 A. No.

3 Q. Is it correct that  
4 congregations of Jehovah's Witnesses in the  
5 19 -- excuse me.

6 Is it correct that between the  
7 1970s and 1990s congregations of Jehovah's  
8 Witnesses in the United States selected  
9 their own elders?

10 A. That's correct.

11 Q. Is it correct that no approval  
12 was required from any other entity or  
13 organization for congregations in the  
14 United States to select their own elders  
15 between the 1970s and 1990s?

16 MS. KORGUL: I'll object to the  
17 form. You can answer.

18 A. That's a little complicated  
19 question. If you could simplify that for  
20 me.

21 Q. Well, I think you've previously  
22 testified, for example, that the Governing  
23 Body approved the selection of elders  
24 during certain periods of history in the  
25 Jehovah's Witness --

1 A. SHUSTER

2 MS. KORGUL: I will object to  
3 this.

4 MR. TAYLOR: Objection.

5 MS. KORGUL: I don't even --

6 MR. TAYLOR: He didn't say  
7 that.

8 MS. KORGUL: -- know where  
9 you're saying this from.

10 MR. TAYLOR: Where was that at?

11 MS. KORGUL: What are you  
12 talking about?

13 Q. You can answer the question.

14 MS. KORGUL: No, no.

15 MR. TAYLOR: Objection.

16 MS. KORGUL: Objection.

17 Totally inappropriate.

18 Q. You can answer the question.

19 A. No.

20 MR. SHAFFER: For the record,  
21 Joel Taylor just looked at the  
22 witness and shook his head no, and  
23 the witness answered no.

24 A. Well, no from the standpoint  
25 I -- I don't quite understand the question.

1 A. SHUSTER

2 MR. TAYLOR: Just --

3 A. If you could --

4 MR. TAYLOR: -- for the record,  
5 this is Mr. Taylor. I was not  
6 signalling anything to anyone. I was  
7 just objecting to his statement,  
8 which clearly was not a statement  
9 made on the record at the deposition  
10 today.

11 MS. KORGUL: All right. I will  
12 direct the witness not to answer this  
13 question.

14 MR. MERRILL: What is the  
15 basis --

16 MS. KORGUL: Let's move on.

17 MR. MERRILL: -- for your  
18 direction?

19 MS. KORGUL: Because it's  
20 totally inappropriate question.  
21 You -- you are misstating the  
22 testimony. He never testified today  
23 that the Governing Body was selecting  
24 the elders.

25 THE REPORTER: Can we go off

1 A. SHUSTER

2 the record, please?

3 MR. MERRILL: Yes.

4 THE VIDEOGRAPHER: All right.

5 We are off the record. The time is

6 10:31 A.M. Eastern Time.

7 (Whereupon, a short recess was  
8 taken.)

9 THE VIDEOGRAPHER: We are back  
10 on the record. The time is 10:44  
11 A.M. Eastern Time.

12 MR. MERRILL: Okay. We got an  
13 objection from your attorney, and an  
14 instruction not to answer just before  
15 the break, and I want to try and  
16 clear up the record a little. And  
17 I'm going to ask the Reporter to  
18 please read back the question that  
19 was pending, and then give you a  
20 chance to state your objection, and  
21 we'll go from there.

22 THE REPORTER: Can we go off  
23 the record?

24 THE VIDEOGRAPHER: You're okay?

25 MR. MERRILL: Okay.



1 A. SHUSTER

2 THE VIDEOGRAPHER: All right.

3 We are off the record. The time is  
4 10:45 A.M. Eastern Time.

5 (Whereupon, an off-the-record  
6 discussion was held.)

7 THE VIDEOGRAPHER: We are back  
8 on the record. The time is 10:46  
9 A.M. Eastern Time.

10 Q. Mr. Shuster, during the 1970s,  
11 did the Governing Body approve or confirm  
12 the appointment of elders to congregations  
13 of Jehovah's Witnesses in the United  
14 States?

15 A. No. No.

16 Q. During the 1980s, did the  
17 Governing Body approve or confirm the  
18 appointment of elders to congregation -- in  
19 congregations of Jehovah's Witnesses in the  
20 United States?

21 A. No.

22 Q. During the 1990s, did the  
23 Governing Body approve or confirm the  
24 appointment of elders within congregations  
25 of Jehovah's Witnesses in the United

1 A. SHUSTER

2 States?

3 A. No.

4 Q. Is there any other committee,  
5 organization or department within the  
6 religious organization of Jehovah's  
7 Witnesses that approved or confirmed the  
8 appointment of elders within Jehovah's  
9 Witness congregations in the United States  
10 during the 1970s to 1990s timeframe?

11 A. No.

12 Q. Is it correct that the  
13 appointment of elders to congregations of  
14 Jehovah's Witnesses in the United States  
15 during the 1970s to 1990s timeframe was  
16 made solely by the elders within each  
17 congregation?

18 A. Correct.

19 Q. Do you currently have any  
20 responsibilities or duties related to  
21 allegations of child sex abuse within  
22 congregations of Jehovah's Witnesses --

23 MS. KORGUL: Objection.

24 Q. -- in the United States?

25 MS. KORGUL: I'm sorry.

1 A. SHUSTER

2 Objection to the form. You can  
3 answer.

4 A. Can you repeat the question,  
5 please?

6 MR. MERRILL: Please do.

7 (Whereupon, the referred to  
8 question was read back by the  
9 Reporter.)

10 MS. KORGUL: Same objection.

11 A. I don't know.

12 Q. Did you have any involvement  
13 with allegations of child sex abuse within  
14 Jehovah's Witness congregations in the  
15 United States between 1973 and 1992?

16 A. I don't know.

17 Q. Is that something that you  
18 would've forgotten?

19 A. It's a long time ago, that's  
20 for sure.

21 Q. Is that something you would've  
22 forgotten?

23 A. I don't think so.

24 Q. In your time at the service  
25 department, did you ever correspond with

1 A. SHUSTER

2 A. In my -- in my view, my brief  
3 review, it appears to be the questions that  
4 one is asked to get baptized.

5 MR. MERRILL: Let's take a  
6 lunch break. Can we agree to go off  
7 the record?

8 MS. KORGUL: Sure.

9 THE VIDEOGRAPHER: We are off  
10 the record. The time is 12:07 P.M.  
11 Eastern Time.

12 (Whereupon, a short recess was  
13 taken.)

14 THE VIDEOGRAPHER: We are back  
15 on the record. The time is 1:20 P.M.  
16 Eastern Time.

17 Q. Good afternoon, Mr. Shuster.

18 A. Good afternoon.

19 Q. You testified this morning that  
20 you became an elder in what year again?  
21 I'm sorry.

22 A. 1979.

23 Q. Do you remember approximately  
24 when you first saw any type of policy or  
25 procedure associated with the religious

1 A. SHUSTER

2 organization of Jehovah's Witnesses for  
3 handling allegations of child sex abuse?

4 MS. KORGUL: I will object to  
5 the form. You can answer.

6 A. I don't recall, no. I don't  
7 know.

8 Q. Do you have any knowledge of  
9 specific policies or procedures related to  
10 handling allegations of child sex abuse  
11 within the religious organization of  
12 Jehovah's Witnesses prior to 1981?

13 MS. KORGUL: I will object to  
14 the form, specifically, policies --  
15 the word -- use of the word policies.  
16 You can answer.

17 A. I don't know.

18 Q. Do you know what the word  
19 policies means?

20 A. I'd have to have it defined.

21 Q. Do you know what the word  
22 procedures means?

23 A. I'd have to have it defined.

24 Q. You told me earlier that  
25 Jehovah's -- you and Jehovah's Witnesses,

1 A. SHUSTER

2 recall that?

3 A. I do.

4 Q. Is your understanding of that  
5 policy that it has changed over time at  
6 all?

7 MS. KORGUL: Objection to the  
8 form.

9 A. Yeah. I don't remember.

10 Q. So you're not aware today of  
11 any different policy or rule or procedure  
12 at any time regarding reporting child sex  
13 abuse allegations to authorities?

14 A. I don't know.

15 Q. How did you learn or come to  
16 understand how to handle these types of  
17 allegations as an elder?

18 A. Well, some of it's practical  
19 wisdom. Some of it's Bible principles that  
20 we have, and we have publications that have  
21 Bible principles stated, help explain them.

22 Q. Do you have any personal  
23 understanding of what a policy is regarding  
24 how Jehovah's Witnesses handle an  
25 allegation?

1 A. SHUSTER

2 MS. KORGUL: Objection to the  
3 form.

4 A. I don't know.

5 MR. MERRILL: Can I ask you to  
6 clarify your objection, please?

7 MS. KORGUL: Yeah. The --  
8 yes. Using the word policy. You  
9 haven't established that they have  
10 any policies. In fact, they don't  
11 have policies. So the use of the  
12 word policy is an inappropriate  
13 objection in an inappropriate form.  
14 That's my objection.

15 It's a religious institution.  
16 It's not a business. It's not an  
17 employer that has policies like  
18 anti-harassment policy or workers'  
19 compensation policy. It's a  
20 religious organization; right?

21 Q. Mr. Shuster, is it correct that  
22 the religious organization of Jehovah's  
23 Witnesses does not have any policies?

24 A. I am not aware.

25 Q. You don't know --

1 A. SHUSTER

2 Q. How long would it take you to  
3 try and count them up in your head?

4 A. I'd have to write them down.

5 Q. Are you on the Branch  
6 Committee?

7 A. I am.

8 Q. But you don't know how many  
9 members there are, as we sit here today,  
10 without writing them down. Is that  
11 correct?

12 A. I'd have to -- it's changed  
13 back and forth. I'd have to think about  
14 the current number.

15 Q. Can you give me some numbers  
16 that have been correct over time? You  
17 know, has it ranged between five and twenty  
18 or two and four or some -- can you provide  
19 me any kind of an estimate that way?

20 A. Somewhere between twelve and  
21 probably somewhere in the range of twenty.

22 Q. How long have you been on the  
23 Branch Committee?

24 A. I don't know the specific date.  
25 Eleven years, thereabouts.



1 A. SHUSTER

2 Q. Were you ever on the Branch  
3 Committee prior to that eleven years?

4 A. No.

5 Q. Is it correct that the Branch  
6 Committee meets once per week?

7 MS. KORGUL: Objection to the  
8 form. You can answer.

9 A. Sometimes, yeah. Sometimes.  
10 Sometimes less.

11 Q. Where do those meetings occur?

12 A. They're at Walkill.

13 Q. Is that in a building that is  
14 part of Bethel?

15 A. That's correct.

16 Q. Do you know whether the Branch  
17 Committee owns the building?

18 A. I do not know that.

19 Q. Are the members of the Branch  
20 Committee made up of Jehovah's Witnesses  
21 who also have positions in, for example,  
22 WTNY, WTPA and CCJW?

23 MS. KORGUL: Objection to the  
24 form.

25 A. I am, yes.

1 A. SHUSTER

2 A. Correct.

3 Q. Is the legal department  
4 residing within the United States Branch?

5 MS. KORGUL: Objection to the  
6 form, residing.

7 A. Yeah.

8 MS. KORGUL: You're asking  
9 about the physical location?

10 MR. MERRILL: No. I'm asking  
11 whether the legal department is part  
12 of the U.S. Branch.

13 A. I'm not sure how it's  
14 categorized.

15 Q. Do you know whether WTNY has  
16 any office space in the U.S. Branch?

17 A. I do not.

18 Q. Do you know whether WTPA has  
19 any office space in the U.S. Branch?

20 A. I do not.

21 Q. Do you know whether the U.S.  
22 Branch has a bank account?

23 A. Not to my knowledge.

24 Q. Do you know whether the United  
25 States Branch owns or leases any property

1 A. SHUSTER

2 in the United States?

3 A. I do not.

4 Q. Do you know whether the United  
5 States Branch retains any attorneys?

6 A. I do not.

7 Q. Do you know whether -- excuse  
8 me.

9 Do you know whether the United  
10 States Branch has any accountants?

11 A. I do not.

12 Q. Do I understand correctly that  
13 between 1985 and 2001, you were authorized  
14 within the service department to  
15 communicate with congregations in the  
16 United States on WTNY letterhead?

17 MS. KORGUL: Objection to the  
18 form.

19 A. I prepared letters in behalf of  
20 the service department and those letters  
21 were sent to congregations, yes.

22 Q. Did you prepare letters in the  
23 service department between the years of  
24 1985 and 2001?

25 A. Yes.

1 A. SHUSTER

2 Q. Did those letters include  
3 letters that were sent to congregations of  
4 Jehovah's Witnesses in the United States?

5 A. Yes.

6 Q. Were those letters that we just  
7 discussed in your answer to the previous  
8 question sent on WTNY letterhead?

9 A. What year?

10 Q. 1985 to 2001 or please correct  
11 me if there's a different set of years that  
12 are correct.

13 A. Yeah. I think that's accurate,  
14 yes.

15 Q. Were you authorized by WTNY to  
16 use the letterhead for the letters we just  
17 discussed in the prior question?

18 MS. KORGUL: Objection to the  
19 form.

20 A. That I don't know.

21 Q. Did you previously know whether  
22 or not you were authorized?

23 A. No.

24 Q. Does the service department  
25 work with or through WTNY or WTPA -- excuse

1 A. SHUSTER

2 me. I'm going to strike that.

3 In the years prior to 2001, did  
4 the service department work with either  
5 WTNY or WTPA in carrying out its  
6 operations?

7 MS. KORGUL: Objection to form.

8 A. I don't know.

9 Q. Do you know anything about what  
10 types of records the service department  
11 keeps?

12 A. We have congregations. We have  
13 12,000 congregations in the United States,  
14 and we have some indication as to who serves  
15 as elders and ministerial servants in those  
16 congregations.

17 Q. Is the service department  
18 provided with records of the ministry  
19 activities by congregations in the United  
20 States?

21 MS. KORGUL: Objection to the  
22 form.

23 A. The question is a little vague.  
24 Can you help me understand what you mean?

25 Q. Have you ever heard of an S-1

1 A. SHUSTER

2 desk or who has an office?

3 A. No.

4 Q. We've talked about different --  
5 is entities a fair way to describe the  
6 branch versus the service department or do  
7 you have a word that describes those?

8 A. Service department is a  
9 department within the United States Branch.

10 Q. Do -- does WTNY have separate  
11 offices from the service department or the  
12 branch?

13 MS. KORGUL: Objection to the  
14 form.

15 A. I don't know.

16 Q. Same question about WTPA. Do  
17 they have offices that are distinct from  
18 the service department offices or the  
19 branch?

20 A. I don't know.

21 Q. Does CCJW have offices that are  
22 distinct from the service department or the  
23 branch?

24 A. I don't know.

25 Q. You're the president of CCJW;

1 A. SHUSTER

2 correct?

3 A. Yes.

4 Q. Do you have an office as the  
5 president of CCJW?

6 A. I do not.

7 Q. Do you perform your duties as  
8 president of CCJW from your office that  
9 you've described earlier to me?

10 A. Perform duties? What duties?  
11 Sign papers, perhaps. That's about it from  
12 my office.

13 Q. What other duties do you have  
14 as president of CCJW?

15 A. Constructing the board of  
16 director meetings. That's not done in my  
17 office.

18 Q. Do those meetings occur in  
19 Walkill?

20 A. They do.

21 Q. You testified that you're a  
22 member of WTNY. Do I understand that  
23 correctly?

24 A. That's correct.

25 Q. Are you a voting member?

1 A. SHUSTER

2 A. Yes.

3 Q. Do you attend meetings for WTNY  
4 in that capacity?

5 A. Yes.

6 Q. Where are those meetings held?

7 A. Variety of locations. In years  
8 past, in New Jersey; in more recent years,  
9 in New York.

10 Q. Where in New York, please?

11 A. Newburgh, New York.

12 Q. Does WTNY have offices in  
13 Newburgh, New York?

14 A. I don't know.

15 Q. Where in New Jersey when you  
16 described meetings in years past are you  
17 referring to?

18 A. In Jersey City, New Jersey.

19 Q. Do you know whether WTNY had  
20 offices there at that time?

21 A. I do not.

22 Q. You're also a member of WTPA;  
23 correct?

24 A. That's correct.

25 Q. A voting member. Is that



1 A. SHUSTER

2 correct?

3 A. Yes.

4 Q. Do you attend meetings in your  
5 capacity as a voting member for WTPA?

6 A. I do.

7 Q. Do you have any other duties in  
8 your capacity as a voting member for WTPA?

9 A. No.

10 Q. Where do you attends those  
11 meetings?

12 A. Could I -- could I correct  
13 something?

14 Q. Yes, please.

15 A. Yeah. I -- I think I'm  
16 confusing your first question with -- I'm a  
17 member of the New York corporation. I'm  
18 not aware of meetings in New Jersey with --  
19 with that corporation, nor with Newburgh,  
20 New York. Pennsylvania corporation  
21 meetings have been in New Jersey and in  
22 Newburgh, New York.

23 So there wasn't a specific  
24 location for the meetings of the New York  
25 corporation other than Walkill.